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July 11, 2023

VIA ECF

Hon. Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

Re: *American GreenFuels Rockwood (Tennessee), LLC v. Aik Chuan Construction PTE, Ltd.* (Case No. 1:21-cv-07680)

Dear Judge Cote:

Aik Chuan Construction Pte., Ltd. (“Aik Chuan”) respectfully submits this Consent Letter Motion for an Extension of Time. Aik Chuan requests a one-week extension of the expert disclosure and report deadlines only. American GreenFuels Rockwood (Tennessee), LLC and Kolmar Americas, Inc. (collectively, “Kolmar”—the only other parties in this matter—do not oppose this extension request.

Pursuant to this Court’s September 29, 2022 Pretrial Scheduling Order, initial expert disclosures are due July 28, 2023, and rebuttal disclosures are due August 25, 2023 (ECF No. 61). Aik Chuan seeks a one-week extension of these deadlines to August 4, 2023 and September 1, 2023, respectively. By agreement, the parties have continued to conduct depositions through this month, including corporate representative and third-party depositions. A one-week extension will, Aik Chuan believes, better enable that the expert testimony in this case has the benefit of key information likely to be revealed in these depositions, with a corresponding week for rebuttal report(s). This is Aik Chuan’s first request to extend these deadlines. The parties do not seek to modify any other deadlines, including the September 22, 2023 deadline to complete all discovery.

Respectfully submitted,

/s/ John F. Hagan Jr
John F. Hagan Jr

cc: Counsel of record (via ECF)